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KAREN JENKINS, JACQUELINE MAYS,
SUSAN LOLLI, LINDA RUSSELL, TERESA
LATTANZE, JOHN VAN ALLEN III, DONNA
ANDERSON, DEBRA KONTRA, MICHELLE
QUARLES, TROY JOHNSON, SHARON
SCHULTZ, RAYMOND GUNTHER and
JOHN DOE,

Plaintiffs,

vs.

THE UNION LABOR LIFE COMPANY,
INC.; THE AMALGAMATED LIFE
INSURANCE COMPANY;
INDUSTRIAL, TECHNICAL AND
PROFESSIONAL EMPLOYEES UNION;
and OFFICE AND PROFESSIONAL
INTERNATIONAL UNION,

Defendants.
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Civil Action No. 10-7361

AFFIDAVIT OF DAVID WALSH

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

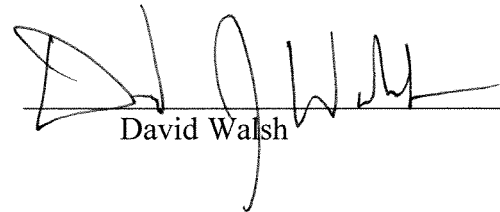
David Walsh, being duly sworn, declares and states as follows:

1. I am President, Chief Executive Officer (“CEO”), and a member of the Board of Directors of the Amalgamated Life Insurance Company (“ALICO”), a defendant in the above-captioned action. I make this affidavit in further support of ALICO’s Motion for Summary Judgment based upon my personal knowledge of the facts recited herein and upon my review of records kept in the course of regularly conducted business.

2. I have been employed by ALICO as President, CEO, and a member of the Board of Directors since January 21, 2008. I report directly to ALICO’s Board of Directors.


3. As I stated in my previous affidavit submitted to the Court on July 16, 2012 in support of ALICO’s Motion for Summary Judgment, ALICO did not contemplate closing the claims processing operation in the Pennsylvania office (the “PSC”) prior to the late summer of 2010—months after the Memorandum of Understanding (which modified the 2007 collective bargaining agreement) between ALICO and the Industrial, Technical & Professional Employees Union was signed on May 4, 2010.

4. I understand that Plaintiffs' Statement of Undisputed Facts at ¶ 30 and their brief in opposition to ALICO's Motion for Summary Judgment at p. 18 provide that ALICO "knew it was going to close the [PSC] in February of 2010." Plaintiffs support their claim by pointing to November 23, 2010 meeting minutes of ALICO's Executive Committee. Plaintiffs have taken the position that these minutes show that ALICO thought about closing the PSC "as early as February 2010." That is not the case. The February memorialized in the November 23, 2010 meeting minutes is in reference to February 2011—not February 2010. February 2011 was the month in which the PSC lease was set to expire. I reported at the November 23, 2010 meeting about ALICO's contingency plans in the event that ALICO was unable to renew the lease or find appropriate alternative space when the lease expired in February 2011.



David Walsh

Sworn to before me this
19th day of September, 2012.



Notary Public

EMILY STOWE HATCH
Notary Public, State of New York
No. 02HA6255276
Qualified in New York County
Commission Expires Jan. 30, 2016

